

EXHIBIT 1

Illustration of Procedural History of
“Branstetter Actions”

**Original Complaint Purporting to Allege Only
Product Liability Without Certificate of Good Faith**



**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEAST DIVISION**

ELIZABETH BRAY,)	
)	
Plaintiff,)	
)	
v.)	
)	
AMERIDOSE, LLC, MEDICAL SALES)	Case No.
MANAGEMENT, INC., MEDICAL SALES)	JURY DEMAND
MANAGEMENT SW, INC., GDC)	
PROPERTIES MANAGEMENT, LLC, ARL)	
BIO PHARMA, INC. D/B/A ANALYTICAL)	
RESEARCH LABORATORIES, BARRY J.)	
CADDEN, GREGORY CONIGLIARO, LISA)	
CONIGLIARO CADDEN, DOUGLAS)	
CONIGLIARO, CARLA CONIGLIARO,)	
GLENN A. CHIN, SPECIALTY SURGERY)	
CENTER, PLLC, DR. KENNETH R. LISTER,)	
)	
Defendants.)	
)	

COMPLAINT

The Plaintiff, Elizabeth Bray, for her cause of action against the defendants respectfully states to the Court as follows:

**COUNT VI
PRODUCT LIABILITY CLAIMS
(Against Specialty Surgery Center and Dr. Kenneth Lister)**

Amended Complaint Explicitly Alleging Health Care Liability
With Certificate of Good Faith



**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ELIZABETH BRAY,	:	CIVIL ACTION NO. 1:13-cv-12596-FDS
	:	
Plaintiff,	:	MDL No. 2419
	:	Master Docket No. 1:13-md-2419-FDS
v.	:	Honorable F. Dennis Saylor
UNIFIRST CORPORATION, A/D/B/A	:	
UNICLEAN CLEANROOM	:	
SERVICES, SPECIALTY SURGERY	:	<u>DEMAND FOR JURY TRIAL</u>
CENTER, PLLC, and KENNETH R.	:	
LISTER	:	
	:	
Defendants.	:	

**SHORT FORM COMPLAINT
AGAINST UNAFFILIATED DEFENDANTS**

- COUNT III: NEGLIGENCE AND GROSS NEGLIGENCE (Against Clinic Related Defendants)

- COUNT VIII: FAILURE TO WARN (Against Clinic Related Defendants)